



March 13, 2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Wireless Emergency Alert Test for V.C. Summer Nuclear Station

Dear Mr. Wilhelm:

The South Carolina Emergency Management Division (SCEMD), which is the primary initiator of public alerts in the state of South Carolina using the Integrated Public Alert and Warning System (IPAWS), requests a Federal Communications Commission (FCC) rule waiver to allow a live test of the Wireless Emergency Alert (WEA) system and involving Commercial Mobile Service providers conducting business in the following South Carolina counties:

- Fairfield County, SC
- Lexington County, SC
- Newberry County, SC
- Richland County, SC

As proposed, and if approved, the tests would be conducted at 1:00 p.m. on April 2, 2019, targeting the area that corresponds with the sounding of notification sirens, and will be activated from the state's Emergency Operations Center following training and consultation with FEMA IPAWS personnel. This test will be in parallel to regularly scheduled live siren tests for V.C. Summer Nuclear Station, and will utilize a live code for WEA and a test code for EAS. No back-up dates are planned due to the desire to conduct these tests concurrent with regularly scheduled siren tests. This live siren test and its date of April 2 are a Federal requirement through the U.S. Nuclear Regulatory Commission and the Federal Emergency Management Agency.

The WEA message is planned to only be broadcast to cell phones that are located within the VCSNS 10-mile Emergency Planning Zone, the radius of which encompasses portions of the following counties:

- Fairfield County, SC
- Lexington County, SC
- Newberry County, SC
- Richland County, SC

The text of the WEA test will read as follows, "THIS IS A TEST OF THE SOUTH CAROLINA WIRELESS EMERGENCY ALERT SYSTEM. NO ACTION REQUIRED."

This test will not be a substitute for any required periodic EAS test.

While SCEMD has issued many wireless emergency alerts during actual incidents, such as hurricane, this is will be the first live test of the WEA system within the state of South Carolina, and is being conducted in conjunction with Dominion Power to ascertain the reception and understanding of WEA messaging versus

sonic means of notification (sirens) in the event of a nuclear power plant emergency incident. Further, these tests will enhance public safety by ensuring that residents of the state of South Carolina and those surrounding the nuclear power station in particular, have fast, actionable and credible information available to them in times of major emergencies.

Given the critical need to expose the public to the type of messages they may receive during a time of crisis, anecdotal information on the lack of public understanding of siren notification, and our fervent belief that IPAWS is a far superior means of notifying the public in the event of an emergency, the state of South Carolina feels there is an urgent need to complete these tests now as opposed to waiting until the end-to-end FCC testing rules are put into place in May 2019. Subsequent to the test, Dominion Energy will be conducting a phone survey to determine reception of the message, understanding by the public, geographic reception, and any carrier differences.

SCEMD has socialized this effort throughout all affected areas to include local leadership, CMS carriers, and locality public information officers. The state of South Carolina has prepared an extensive media campaign, utilizing public outreach through press releases and social media, to ensure public understanding of the need and value for the scheduled WEA/EAS tests.

All emergency authorities that operate within and adjacent to the affected localities, including first responder organizations such as law enforcement, fire/EMS agencies, and 911 public safety operating points (PSAPS), will be or have been informed to ensure they are aware of the test and confirm to the public the WEA message is a test. Additionally, SCEMD along with Dominion Energy plan to conduct outreach to local school and hospitals in the broadcast area as these facilities are already actively involved with V.C. Summer's radiological emergency planning efforts. SCEMD will provide a script to PSAPS to address any questions that might arise from the public as a result of these tests.

To date, no stakeholder, including the wireless carriers servicing the area of broadcast, have noted any issues with the conduct of such a live test. Local emergency managers are in support of this effort. SCEMD plans to record the test results and provide a detailed account of any problems that occur in the distribution and understanding of the WEA test to your office. SCEMD anticipates that, due to the nature of the proposed test, members of the public outside the affected localities may receive a test and accordingly will address this issue in its outreach materials and interaction with the public.

If you have any questions or need further information, please feel free to contact me at any time at dbecker@emd.sc.gov or 803-737-8500. Thank you for your assistance. We look forward to hearing from you soon, so we can move forward with our planning.

Sincerely,



Derrec Becker
Chief, Public Information and External Affairs
South Carolina Emergency Management Division